



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AFM  
F. #2016R02228

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 15, 2020

By Email and ECF

Andrew J. Frisch  
One Penn Plaza, Suite 5315  
New York, NY 10119

Re: United States v. Aleksandr Zhukov  
Criminal Docket No. 18-633 (ERK)

Dear Mr. Frisch:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, consisting of the following material:

- **ZHU000589-ZHU000646** – Draft translations of notes from the defendant's iCloud account;
- **ZHU000647-ZHU000702** – Draft translations of images from the defendant's iCloud account;
- **ZHU000703-ZHU000813** – Translations of records relating to an account controlled by the defendant at PNB Bank in Latvia, produced in their original form today at ZHU003998-ZHU004132;
- **ZHU003284-ZHU003547** – Translation of records from Česka Sporitelna bank in the Czech Republic, relating to an account controlled by the defendant, produced in their original form on December 11, 2019 with Bates number ZHU000300;
- **ZHU003998-ZHU004178** – Records relating to an account controlled by the defendant at PNB Bank in Latvia; and
- **ZHU0004179** – Records produced by Interactive Brokers with respect to an account owned by the defendant.

The following material produced under cover of this letter is designated **sensitive discovery material** pursuant to the protective order issued by the Court on July 31, 2019.

- **ZHU003548-ZHU003624** – Chat records produced by Google with respect to a co-conspirator of the defendant(“Co-conspirator-1”);
- **ZHU000312-ZHU000351** – Draft translations of emails and chats from Co-conspirator-1’s Google accounts;
- **ZHU000352-ZHU000588** – Draft translations of emails from the Google account of a co-conspirator of the defendant(“Co-conspirator-2”);
- **ZHU000814-ZHU003283** – Records produced by Wells Fargo; and
- **ZHU003625-ZHU003997** – Records produced by Citibank

The government also requests reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Alexander Mindlin  
Alexander Mindlin  
Assistant U.S. Attorney  
(718) 254-6433

Enclosures

cc: Clerk of the Court (ERK) (by ECF) (without enclosures)